

DAVID H. KRAMER, SBN 168452  
 Email: dkramer@wsgr.com  
 MAURA L. REES, SBN 191698  
 Email: mrees@wsgr.com  
 WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation  
 650 Page Mill Road  
 Palo Alto, CA 94304-1050  
 Telephone: (650) 493-9300

ERIC P. TUTTLE, SBN 248440  
 Email: eric.tuttle@wsgr.com  
 WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation  
 701 Fifth Avenue, Suite 5100  
 Seattle, WA 98104-7036  
 Telephone: (206) 883-2500

*Counsel for Defendant*

RYAN J. CLARKSON, SBN 257074  
 Email: rclarkson@clarksonlawfirm.com  
 YANA HART, SBN 306499  
 Email: yhart@clarksonlawfirm.com  
 TIARA AVANESS, SBN 343928  
 Email: tavaness@clarksonlawfirm.com  
 VALTER MALKHASYAN, SBN 348491  
 Email: vmalkhasyan@clarksonlawfirm.com  
 CLARKSON LAW FIRM, P.C.  
 22525 Pacific Coast Highway  
 Malibu, CA 90265  
 Telephone: (213) 788-4050

Tracey Cowan, SBN 250053  
 Email: tcowan@clarksonlawfirm.com  
 CLARKSON LAW FIRM, P.C.  
 93 3rd Street, 2nd Floor  
 San Francisco, CA 94103  
 Telephone: (213) 788-4050

*Counsel for Plaintiffs and the Proposed Classes*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.  
 individually, and on behalf of all other similarly  
 situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE CASE  
 MANAGEMENT CONFERENCE**

Judge: Hon. Araceli Martínez-Olgún

1 Defendant Google LLC and Plaintiffs J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.  
 2 (collectively, “the Parties”), by and through their respective counsel of record, hereby stipulate as  
 3 follows:

4 WHEREAS, Plaintiffs filed this action on July 11, 2023 (ECF No. 1);

5 WHEREAS, Defendant filed its motion to dismiss on October 16, 2023 (ECF No. 20);

6 WHEREAS, the Court has set an initial case management conference for this case for  
 7 October 26, 2023 at 10 a.m., and the joint case management statement is presently due by October  
 8 19, 2023 (ECF No. 10);

9 WHEREAS, the Parties have met and conferred multiple times on case management issues,  
 10 and are continuing to do so;

11 WHEREAS, the Parties believe that, with additional time to meet and confer on case  
 12 management matters, they may be able to reach further agreement and streamline case  
 13 management issues for presentation to the Court;

14 WHEREAS, the Parties agree that good cause exists for a brief continuance of the case  
 15 management conference and related deadlines (namely, the deadline for filing the joint case  
 16 management statement and exchanging initial disclosures under Rule 26(a));

17 WHEREAS, counsel for the Parties have conflicts in November due to travel obligations  
 18 and the Thanksgiving holiday, but are available on November 30, 2023;

19 WHEREAS, the stipulated continuance would not affect any other date or deadline set by  
 20 the Court apart from the date of the case management conference and the deadline for submission  
 21 of the joint case management statement;

22 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject  
 23 to the approval of the Court, as follows:

- 24 1. The Initial Case Management Conference, currently scheduled for October 26, 2023 at  
 25 10 a.m., shall be continued to November 30, 2023 at 10 a.m.;
- 26 2. The Parties’ joint case management statement shall be filed by November 22, 2023;  
 27 and
- 28 3. The Parties shall make their Rule 26(a) initial disclosures by November 22, 2023.

1 Dated: October 17, 2023

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

2  
3 By: /s/ David H. Kramer

4 David H. Kramer  
dkramer@wsgr.com

5 *Counsel for Defendant*

6 Dated: October 17, 2023

CLARKSON LAW FIRM  
Professional Corporation

7  
8 By: /s/ Yana Hart

9 Yana Hart  
yhart@clarksonlawfirm.com

10 *Counsel for Plaintiffs and the Proposed Classes*

11 **SIGNATURE ATTESTATION**

12 I, David H. Kramer, am the ECF User whose ID and password are being used to file this  
13 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence  
14 in the filing of this document has been obtained from the other signatory.


15 By: /s/ David H. Kramer

16 David H. Kramer

17  
18  
19  
20 **ORDER**

- 21 1. The Initial Case Management Conference, currently scheduled for October 26, 2023 at  
10 a.m., shall be continued to November 30, 2023 at 10 a.m.;
- 22 2. The Parties' joint case management statement shall be filed by November 22, 2023; and
- 23 3. The Parties shall make their Rule 26(a) initial disclosures by November 22, 2023.

24  
25 Dated: October 17, 2023

  
ARACELI MARTÍNEZ-OLGUÍN  
United States District Judge